



State of Washington Department of Ecology
Northwest Regional Office
WATER COMPLIANCE INSPECTION REPORT

substitute for OMB No. 2040-0057 and EPA form 3560-3 (Rev. 9-94)
(last file update 12-95.)

Section A: National Data System Coding (i.e., PCS)

Transaction Code 1 N 2 5	NPDES # 3 SO3003645 11	yr/mo/day 12 13/04/0 17	Inspection Type 18 C	Inspector 19 S	Fac Type 20 2
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Remarks

Inspection work days 67 ____ 69	Facility Self-Monitoring Evaluation Rating 70 5	BI 71 N	QA 72 N	Reserved 73 ____ 74 ____ 75 ____ 80
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Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Seattle Iron and Metals 601 S. Garden (Myrtle) Seattle, WA	Entry Time/Date 1:45 AM 04/13/00	Permit Effective Date 6-4-99
	Exit Time / Date 3:20 AM 04/13/00	Permit Expiration Date 11/18/00

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)
Eric R. Paul, Assistant Vice President of Operations
206-834-4441 fax: 206-623-1231
epaul@seairon.com

Other Facility Data

Name, Address of Responsible Official/Title/Phone and Fax Number.

Phone Number Fax Contacted? ☐ Yes ☐ No

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input checked="" type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input type="checkbox"/> Operations&Maint.	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input checked="" type="checkbox"/> Pollution Prevention
<input type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia
<input type="checkbox"/> Effluent/Receiving water	<input type="checkbox"/> Laboratory	<input checked="" type="checkbox"/> Storm Water	<input type="checkbox"/> other

Section D: Summary of Findings/Comments

The business moved from Harbor Island to this site which was designed for the operation. The stormwater (up to the design capacity) is collected on site and conveyed to a stormwater treatment system. That system is still being brought on line and has not achieved satisfactory performance yet. More rain will provide opportunities to continue to tune up the system. Potential discharges must meet effluent limits. Effluent that does not meet water quality standards may not be discharged to the river. In theory, it could be discharged back to the retention and detention system and reprocessed. We recommended that the company also determine whether METRO/King County would take off spec discharges to the sanitary sewer. The discharge from the treatment train will easily meet pretreatment requirements.

We suggested that on site wash down could be done with either treated or stored stormwater. It would be a conservation measure. The washdown water in the vicinity of the shredder may not be discharged to the stormwater collection system. The discharge of process water should be to the sanitary sewer. This should also be discussed with sewer staff.

The move was done with increasing urgency. Significant penalties were possible if the move were delayed. Because of the rush, the site was not organized as well as it should be. Some of the scrap metal is stored too close to the river's edge. It is important to pull the materials back away from the edge of the site. The stormwater pollution prevention plan has not been fully implemented. Oil spills need to be cleaned up promptly. Small areas where asphalt has been damaged should be repaired. Asphalt may be an inappropriate material for use in the working area. Fuel tanks although contained, were not stored under cover. Some of the equipment under repair seemed to also be located too close to the edge of the site. The need to relocate from one site to another has created problems that would not exist if the business has simply begun operations at the new location.

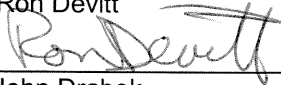
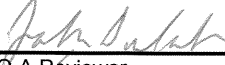
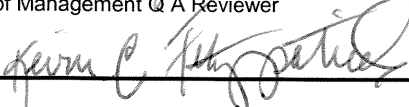
Additional stormwater protection is necessary. We requested that the company assess the structural, operational and housekeeping deficiencies and prioritize actions with target dates for compliance. Topping the list would be to have the treatment system operating at design efficiency and producing an effluent that meets water quality standards at the end of the system.

A copy of the Stormwater Pollution Prevention Plan (SWPPP) should also be sent to Ecology. The Pollution Control Officer needs to make sure that the plan is fully implemented. Corrections should be made as soon as possible. Generally, compliance with the SWPPP should take precedence over routine business.

4/18/00

Inspection Report

NPDES # **SO3003645**

Name(s) and Signatures of Inspector(s) Ron Devitt 	Agency/Office/Telephone WA Dept. of Ecology/NWRO/425-649-7028 3190 160th Ave SE, Bellevue, WA 98008-5452	Date 04/18/00
John Drabek 		
Signature of Management Q A Reviewer 	Agency/Office/Phone and Fax Numbers WA Dept. of Ecology/NWRO/(425)649-7000 fax 425-649-7098	Date 4/18/00

UNANNOUNCED Inspection

INSTRUCTIONS**Section A: National Data System Coding (i.e., PCS)**

Column 1: Transaction Code. Use N, C, or D for New Change or Delete. All inspections will be new unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility's NPDES permit number. *(Use the Remarks columns to record State permit number, if necessary.)*

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 94/06/30 = June 30, 1994).

Column 18: Inspection Type. Use one of the codes listed below to describe the type of inspection:

A Performance Audit	L Enforcement Case Support	2 IU Sampling Inspection
B Compliance Biomonitoring	M Multimedia	3 IU Non-Sampling Inspection
C Compliance Evaluation (non-sampling)	P Pretreatment Compliance Inspection	4 IU Toxics Inspection
D Diagnostic	R Reconnaissance	5 IU Sampling Inspection with Pretreatment
E Corps of Engineers Inspection	S Compliance Sampling	6 IU Non-Sampling Inspection with pretreatment
F Pretreatment Follow-up	U IU Inspection with Pretreatment Audit	7 IU Toxics with Pretreatment
G Pretreatment Audit	X Toxics Inspection	
I Industrial User (IU) Inspection	Z Sludge	

Column 19: Inspector Code. Use one of the codes listed below to describe the *lead agency* in the inspection.

C - Contractor or Other Inspectors (<i>Specify in Remarks Columns</i>)	N - NEIC Inspectors
E - Corps of Engineers	R - EPA Regional Inspector
J - Joint EPA/State Inspectors - EPA Lead	S - State Inspector
	T - Joint State/EPA Inspectors - State Lead

Column 20: Facility Type. Use one of the codes below to describe the facility.

- 1 - Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
- 2 - Industrial. Other than municipal, agricultural, and Federal facilities.
- 3 - Agricultural. Facilities classified with 1987 SIC 0111 to 0971.
- 4 - Federal. Facilities identified as Federal by the EPA Regional Office

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors; any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as follow-up on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for "Other Facility Data," which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, and other updates to the record).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection. The heading marked "Multimedia" may indicate medias such as CAA, RCRA, and TSCA. The heading marked "Other" may indicate activities such as SPCC, BMPs, and concerns that are not covered elsewhere.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

PHOTO NO. 1

DESCRIPTION:

**Stormwater
treatment system
westerly
components**



PHOTO NO. 2

DESCRIPTION:

**Stormwater
treatment
components
easterly
components—
Multimedia filters
outside the
building**

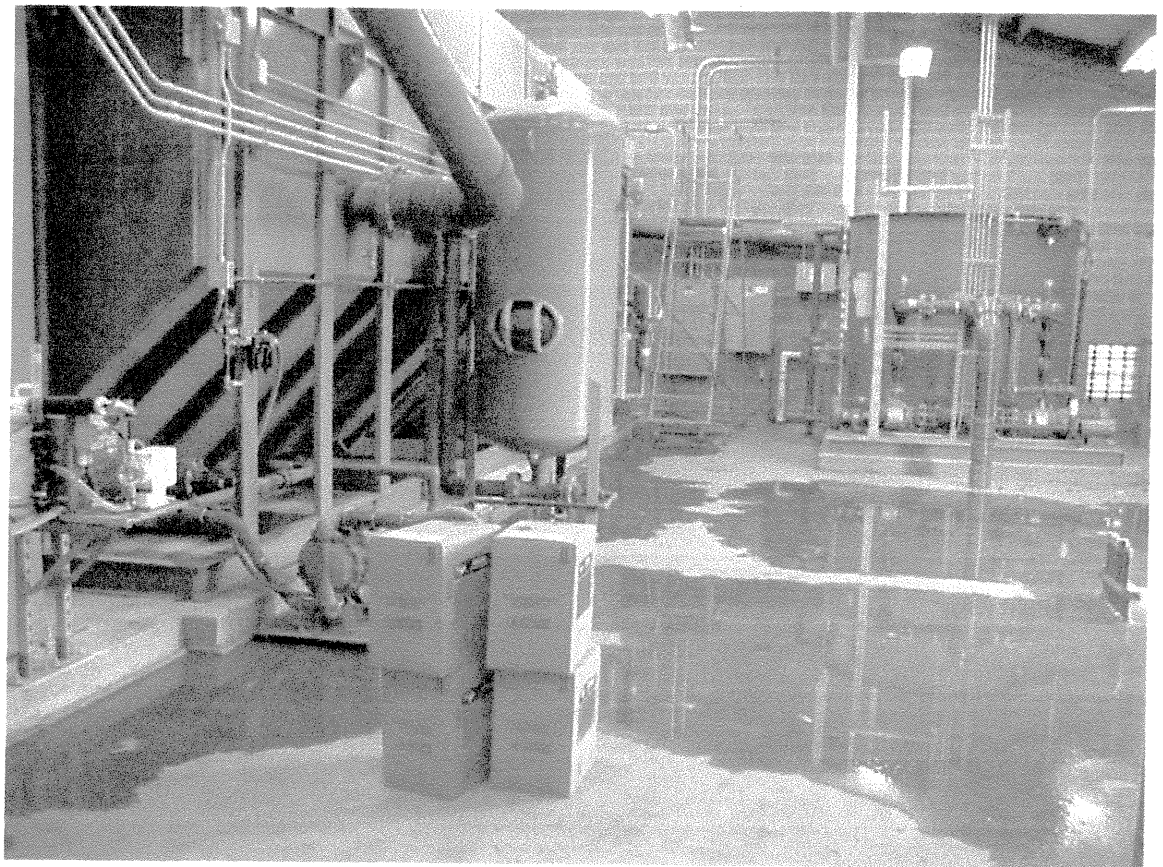


PHOTO NO. 3

DESCRIPTION:

**Metal turnings
area in a shed with
strip drain at
threshold to
capture oil**



PHOTO NO. 4

DESCRIPTION:

**View toward
operation from
near the river's
edge**

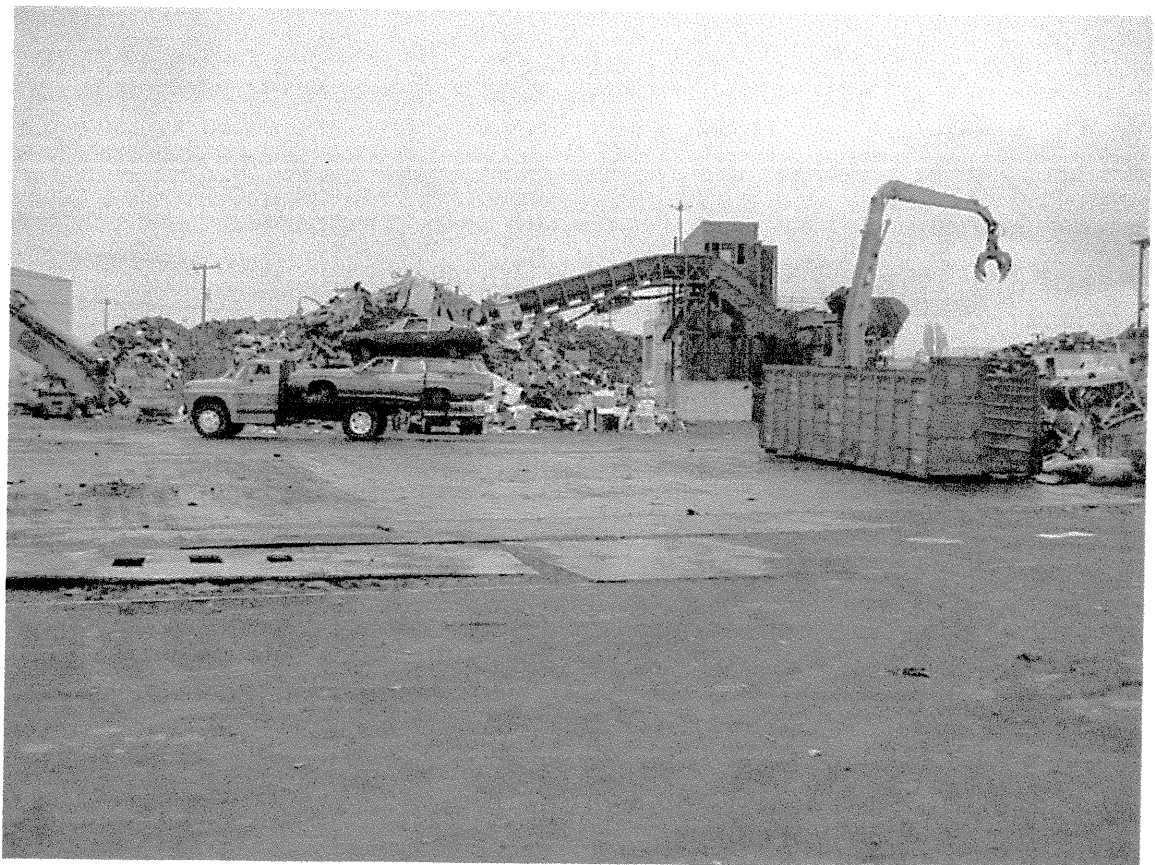


PHOTO NO. 5

DESCRIPTION:

Scrap materials
stored too close to
river

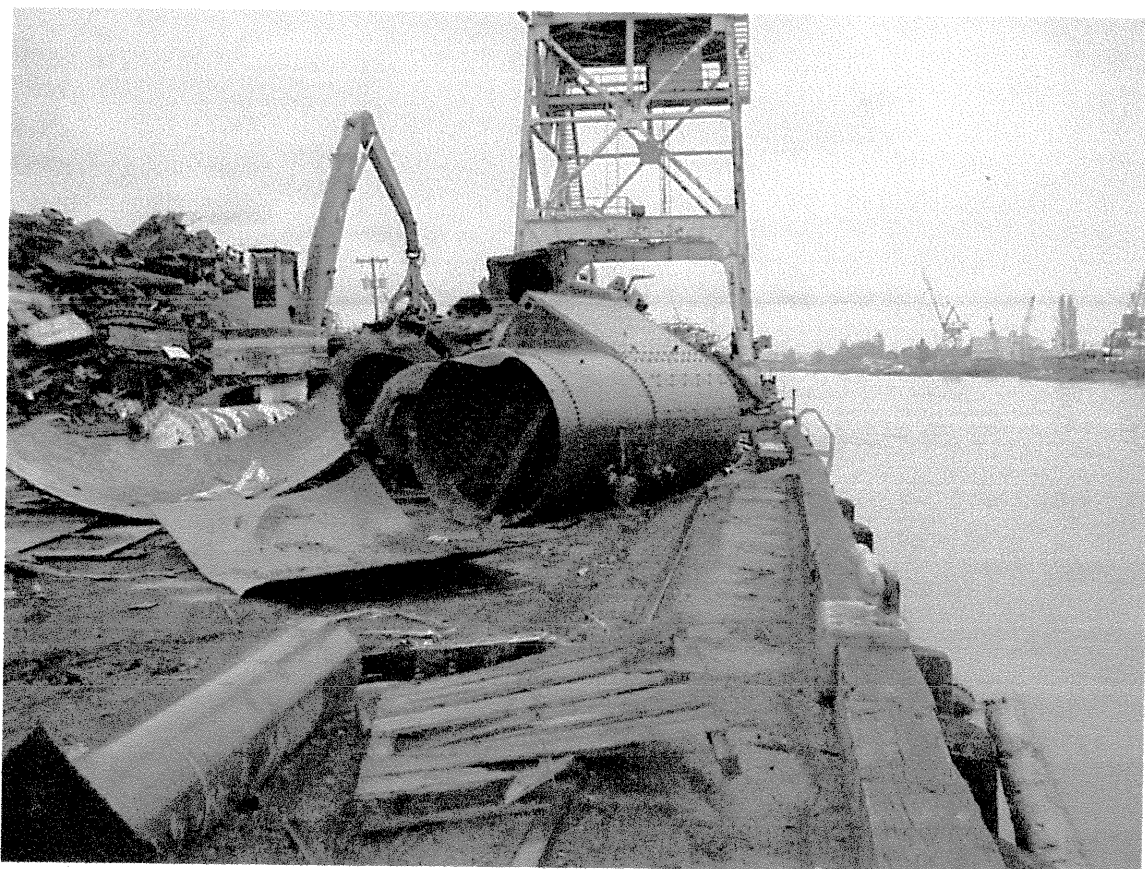


PHOTO NO. 6

DESCRIPTION:

View from off site
to fuel tank and
equipment close to
water

